



WESTON WAY
WEST CHESTER, PA 19380
PHONE: 215-692-3030
TELEX: 83-5348

11 June 1990

Mr. Edgar G. Kaup, P.E.
Case Manager
New Jersey Department of
Environmental Protection
401 East State Street
CN028
Trenton, NJ 08625-0028

Re: L.E. Carpenter and Company Project
Wharton, New Jersey
Revised Feasibility Study Work Plan

Dear Mr. Kaup:

Attached is the revised Feasibility Study Work Plan for the L.E. Carpenter and Company Site in Wharton, New Jersey prepared by Roy F. Weston, Inc. (WESTON). As per your request during our June 5 phone conversation, work on the Feasibility Study (FS) will begin immediately following this submittal with no additional comment period.

The attachment to this letter provides responses to the specific comments raised in your letter dated 25 April 1990 reviewing the draft FS Work Plan. These responses have been incorporated into the revised FS Work Plan as noted.

If you have any questions, please call me at (201) 225-3990.

Very truly yours,

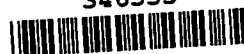
ROY F. WESTON, INC.


Vito J. Cappello, P.E.
Project Director/
Regional Manager

/bs
Attachment

cc: C. Anderson
R. Hahn
J. Josephs -USEPA

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ATTACHMENT

RESPONSE TO COMMENTS ON FS WORK PLAN

- Item: Findings of the Remedial Investigation, p. 2-1
The FS Work Plan identifies that "remnants of drums were found in three test pits in the area to the west of the drainage ditch." Other than the test pit logs, where was this information discussed in the RI Report?
- Response: The FS Work Plan has been revised to report the field observation of drum remnants in four test pits, namely 4B, 5B, 23 and 72. These observations are contained in the test pit logs, Appendix B of the RI, and were mentioned in the NJDEP's comments on the RI.
- Item: Weston must define "acceptable ambient levels". The volatile organic results from May 1989 are of significant levels to warrant further examination.
- Response: The draft RI report used OSHA threshold limit values, an eight hour time weighted average concentration standard, as the basis for acceptable ambient levels. The ambient air data will be compared with health-based standards as part of the risk assessment.
- Item: Conceptual Site Model, p. 3-3
The conceptual site model developed by WESTON for the L.E. Carpenter site suggests that on-site air quality is not be impacted and is therefore not a potential exposure pathway. The Department will require air pollution control if the selected remediation includes soil processing that causes air emissions. Further data/information will be requested in that phase of the remediation.
- No modification required. The potential for an airborne exposure pathway will be discussed in the Risk Assessment.
- Item: Identification/Screening of Remedial Technologies, p. 5-1
The Initial Development and Initial Screening of Remedial Alternatives document submitted by GeoEngineering (dated 30 January 1990) is no longer undergoing review by the Department as stated in the Work Plan. Oral comments were presented to representatives of GeoEngineering and L.E. Carpenter at the meeting of 8 February 1990. Although the document was found to be a good initial effort, it is deficient in details required by SARA and will require expansion.



Response: This change in status is reflected in the revised FS Work Plan.

Item: Schedule and Deliverables, p. 8-2
As proposed, the Feasibility Study will consist of two deliverables, this Work Plan and the Feasibility Study Report. To facilitate adequate communication and proper technical decisions, a report on the development and screening of remedial alternatives must be submitted independent of the detailed analysis of remedial alternatives. This Phase I deliverable must be reviewed and approved by NJDEP before work commences on the Phase II detailed analysis.

Response: An interim draft on the development of remedial alternatives, which is to be reviewed and approved by NJDEP, has been included in the project schedule, Figure 8-1. The purpose and schedule of this report are discussed further in Section 8.

Item: FS Activities
The FS activities must proceed independent of supplemental Remedial Investigation field activities. Sufficient data on plume dimensions, contaminant properties and site hydrogeology are available to develop and select an appropriate technology to remediate the majority of the contaminated groundwater and soils at the site. Any areas not fully delineated to date may be handled as a separate operable unit.

Response: The revised schedule calls for concurrent work on Phase I of the FS and the supplemental RI data gathering activities. Phase II of the FS, the screening and detailed analysis of alternatives, will require NJDEP comments on the supplemental RI and the risk assessment.

Item: Feasibility Study
Activities must proceed, at the minimum, according to or ahead of the schedule in the subject document. The Department desires completing this project as quickly as possible.

Response: The revised schedule in Figure 8-1 reflects NJDEP's sense of urgency. Every effort will be made to complete tasks ahead of schedule where possible.